

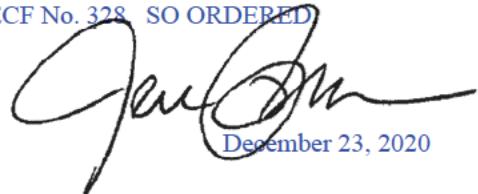
**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

Andrew B. Bloomer, P.C.  
To Call Writer Directly:  
+1 312 862 2482  
andrew.bloomer@kirkland.com

300 North LaSalle  
Chicago, IL 60654  
United States  
+1 312 862 2000  
[www.kirkland.com](http://www.kirkland.com)

Facsimile:  
+1 312 862 2200

Application GRANTED. The parties shall include information responsive to 14-MD-2543, ECF No. 7922 in their submissions no later than **January 7, 2021**. Further, in light of the below, Mr. Yagman's motion to remand is DENIED without prejudice to renewal subject to the procedures the Court adopts concerning further proceedings in the MDL. The Clerk of Court is directed to docket this on 14-MD-2543 and 14-CV-9058 and to terminate 14-CV-9058, ECF No. 328, **SO ORDERED**.



December 23, 2020

The Honorable Jesse M. Furman  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *In re General Motors LLC Ignition Switch Litigation*, 14-MD-2543**  
***Yagman v. General Motors Co. et al.*, 14-CV-9058**

Dear Judge Furman:

New GM submits this response to the Court's December 21, 2020 Memo Endorsement (Dkt No. 8308) concerning a motion to remand filed by plaintiff Stephen Yagman. (Dkt. No. 328 in Case No. 14-CV-9058.) New GM agrees with the Court that Mr. Yagman's request to remand his case should be denied without prejudice to renewal in accordance with whatever procedures the Court adopts following the January 7, 2021 proposal from New GM and Lead Counsel concerning further proceedings in the MDL.

New GM also writes in connection with the Court's May 12, 2020 Memo Endorsement (Dkt. No. 7922), pursuant to which the Court directed the parties to file a joint letter addressing whether the Court should suggest to the JPML that it cease transferring new cases to this Court. The Court set the deadline for that letter as one week after the Court's ruling on the motion for final approval of the class settlement. However, in light of the upcoming holidays and the submission already scheduled for January 7, 2021, New GM respectfully requests that the Court extend the deadline and permit the parties to instead address that issue in the January 7 submission.

Respectfully submitted

/s/ Andrew B. Bloomer, P.C.

*Counsel for Defendant General Motors LLC*

cc: MDL Counsel of Record